

# Nicoletti Hornig & Sweeney

WALL STREET PLAZA  
88 PINE STREET  
SEVENTH FLOOR  
NEW YORK, NY 10005-1801  
TELEPHONE 212-220-3830  
FACSIMILE 212-220-3780  
GENERAL@NICOLETTIHORNIG.COM  
WWW.NICOLETTIHORNIG.COM

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 02/03/2020

JOHN A.V. NICOLETTI  
MANAGING PARTNER  
DIRECT DIAL: 212-220-3837  
JNICOLETTI@NICOLETTIHORNIG.COM

February 3, 2020

**Via E-Filing and E-Mail (Parker NYSDChambers@nysd.uscourts.gov)**

The Honorable Katharine H. Parker  
United States District Court Magistrate Judge  
United States District Court for the Southern District of New York  
500 Pearl Street, Room 750, Room 750  
New York, New York 10007

Re: Blake Marine Group, LLC v. Frenkel & Company  
Docket No: 1:18 Civ. 10759 (AT)  
NH&S File No.: 0-1312 JAVN/TLS/PN

Fact discovery is extended to February 20, 2020 for the sole purpose of conducting the deposition of James Power.

**SO ORDERED:**

*Katharine H. Parker*  
HON. KATHARINE H. PARKER  
UNITED STATES MAGISTRATE JUDGE

Dear Judge Parker:

Our office represents Frenkel & Company in the above captioned case. On Friday 02/03/2020 January 31, 2020, we filed a letter motion requesting the Court order Holland & Knight to comply with outstanding discovery and set dates for their compliance. (R. Doc. 112.) Shortly after filing the letter, our office was contacted by James Power of Holland & Knight who advised that he is available to sit for a deposition on February 20, 2020 in New York. Mr. Power also advised that a certification pursuant to Rule 26(g) that discovery is complete would be provided prior to that deposition.

The current discovery deadline is February 19, 2020. We request an extension of that date solely to allow for Mr. Power's deposition to be conducted on February 20, 2020. Should the Court grant this limited extension, Frenkel withdraws its request that the Court order dates for receipt of the Rule 26 certification and for the deposition of James Power.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

NICOLETTI HORNIG & SWEENEY

By:

*Jah A.V. Nicoletti*  
John A.V. Nicoletti

JAVN/PN/mm

**cc: Via E-Filing**

James Power, Esq.

Holland & Knight LLP